

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

SOUTHERN DISTRICT OF TEXAS
FILED

JUN 08 2018

United States of America

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v.

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Perla Zuniga
Martin Gonzalez

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Case No.

David J. Bradley, Clerk of Court

H18-0922M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 5, 2018, in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 21, United States Code,
Sections 846 and 841(b)(1)(A);

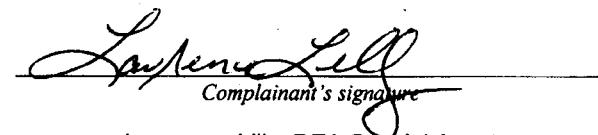
Conspiracy to Possess With Intent to Distribute five (5) or more kilograms of a mixture or substance containing a detectable amount of cocaine, that is, approximately twelve (12) kilograms;

Title 21, United States Code,
Sections 841(a)(1) and 841(b)(1)(A).

Possession With Intent to Distribute five (5) or more kilograms of a mixture or substance containing a detectable amount of cocaine, that is, approximately twelve (12) kilograms.

This criminal complaint is based on these facts:

See attached Affidavit in Support of Criminal Complaint

 Continued on the attached sheet.


Complainant's signature

Lawrence Lilly, DEA Special Agent

Printed name and title

Sworn to before me and signed in my presence
*telephonically*Date: June 8, 2018


Judge's signature

Christina A. Bryan, United States Magistrate Judge

Printed name and title

City and state: Houston, Texas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

PEARLA ZUNIGA
MARTIN GONZALEZ

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H18-0922M
Magistrate Case No.

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lawrence Lilly, being duly sworn, depose and state the following:

1. I am a Special Agent with the Drug Enforcement Administration, United States Department of Justice, and as such, I am empowered under Title 21, United States Code, Section 878, to enforce Title 21 and other criminal laws of the United States, to make arrests and obtain and execute search, seizure, and arrest warrants. I am currently employed as a Special Agent with the Drug Enforcement Administration (DEA), and have been so employed for the past fourteen (14) years. I am currently assigned to the DEA Houston Field Division, and I have been assigned there for approximately eleven (11) years. I was previously employed as a State Trooper with the Texas Department of Public Safety for approximately seven (7) years. In connection with my official duties, I investigate criminal and civil violations of the Controlled Substances Act. I have received special training in the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code. In connection with my duties and responsibilities as a law enforcement officer, I have frequently testified in judicial proceedings for violations of laws concerning controlled substances. I have participated in numerous drug trafficking investigations, including investigations that have resulted in felony arrests for violations of Title 21 of the United States Code. I have been involved in various types of electronic surveillance, in the execution of search and arrest warrants, and in the debriefing of defendants, witnesses, informants, and others who have knowledge of and/or experience in the distribution and transportation of controlled substances, and of the laundering and concealing of narcotics proceeds.

2. I make this Affidavit in Support of Criminal Complaint to be presented to the United States District Court, Southern District of Texas, establishing probable cause for the arrests of **Pearla ZUNIGA** and **Martin GONZALEZ**. The Criminal Complaint charges that **Pearla ZUNIGA** and **Martin GONZALEZ** conspired with others to possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841 (a)(1), 841(b)(1)(A)(ii), and 846. The information contained in this Affidavit is based on personal observations and knowledge, information related to me by other sworn agents and law enforcement officers, and my training and experience in the investigation of narcotics trafficking. The facts set forth in this Affidavit are not the only facts known to Affiant, and they are set forth for the limited purpose of establishing probable cause for arrest.

3. On June 5, 2018, Affiant received information from a cooperating defendant (CD), named as defendant in another related investigation and prosecution, that he had recently negotiated the purchase of twelve (12) kilograms of cocaine with **Pearla ZUNIGA**. The CD further stated that **ZUNIGA** would deliver the cocaine to his residence located at 5223 Lillian, Houston, Texas, which is located in the Southern District of Texas.

4. At approximately 1:15 p.m., the CD made a consensually-recorded telephone call to **ZUNIGA** via cellular telephone number 832-949-6081. During this telephone call, **ZUNIGA** and the CD continued negotiations for the twelve (12) kilograms of cocaine. The CD confirmed that the price of the cocaine was \$23,500 per kilogram and that she (**ZUNIGA**) would deliver the cocaine at approximately 3:30 p.m.

5. At approximately 3:00 p.m., your Affiant, acting in an undercover capacity, met with the CD at the 5223 Lillian Street residence in Houston. Between 3:15 p.m. and 7:45 p.m., the CD and **ZUNIGA** made a series of telephone calls and text messages. During these telephone calls, **ZUNIGA** advised the CD that she (**ZUNIGA**) was en-route to **GONZALEZ**' house to pick up the cocaine. **ZUNIGA** also advised the CD that she (**ZUNIGA**) had picked up seven (7) kilograms from **GONZALEZ**, but that she was waiting for him (**GONZALEZ**) to pick up five (5) more kilograms. Once **ZUNIGA** was in possession of all twelve (12) kilograms of cocaine, **ZUNIGA** contacted the CD and advised him that **GONZALEZ** had just given her (**ZUNIGA**) the remaining five (5) kilograms of cocaine, and that she (**ZUNIGA**) was on the way to deliver the cocaine to the CD. **ZUNIGA** also asked the CD if he wanted her to park in the front or the back. The CD directed **ZUNIGA** to park in the front of the residence.

6. At approximately 7:56 p.m., your Affiant observed a black Ford Explorer bearing Texas license plate number KHT 4612, registered to "Pearla Zuniga, 10614 Lauren Veronica Drive, Houston, Texas," pull in front of the above-mentioned residence. Once at this location, the CD walked outside and greeted **ZUNIGA**. **ZUNIGA** then exited her vehicle, and both she and the CD walked to the rear of her vehicle (the black Ford Explorer). The CD then placed a black backpack in the vehicle and removed a red and black duffle bag from the rear of the vehicle. **ZUNIGA** then reentered the Ford Explorer and departed the area. The CD walked back into the residence and relinquished the suspected twelve (12) kilograms of cocaine to Affiant.

7. Once **ZUNIGA** departed the area, mobile surveillance personnel followed her (**ZUNIGA**). **ZUNIGA** drove approximately four (4) blocks and pulled into the rear parking lot of the Jack-in-the-Box fast-food restaurant, located at 909 Shepherd Drive, Houston, Texas. Surveillance personnel observed **ZUNIGA** park near a white Chevy Tahoe bearing Texas License Plate No. KSJ 3843, which was registered to "Avis Rental Car," and which was occupied by three (3) males. Surveillance personnel observed both **ZUNIGA** and driver of the Chevrolet Tahoe, who was identified as **GONZALEZ**, exit their respective vehicles and walk to the rear of **ZUNIGA**'s vehicle. **ZUNIGA** then reached into her vehicle, removed the black backpack, and handed it to **GONZALEZ**. Both **ZUNIGA** and **GONZALEZ** reentered their respective vehicles and departed the Jack-in-the-Box parking lot.

8. At approximately 8:15 p.m., Sgt. R.M. Cashdollar, who was driving a Houston Police Department (HPD) marked patrol vehicle, conducted a traffic stop of the white Chevrolet

Tahoe in the 5200 block of Inker Street in Houston. At that time, the driver who was identified as **GONZALEZ**, and two (2) black males were removed from the vehicle and identified as Asa Coleman and Justin Pickett. As a result of this traffic stop, Sgt. Cashdollar seized a large amount of United States Currency, approximately ninety-seven (97) grams of suspected codeine, one-hundred-seventy-five (175) grams of a red liquid substance, and 3.67 grams of marijuana.

9. Immediately after the traffic stop, the CD began receiving multiple telephone calls (and messages) and text messages from **ZUNIGA**. **ZUNIGA** was accusing the CD of "setting them up" and not paying for the kilograms of cocaine (inasmuch as the cash money supplied by investigating authorities was, in reality, counterfeit or 'fake' currency). **ZUNIGA** also stated that **GONZALEZ** knew "where [his] (the CD's) mother lives," and she urged the CD to contact them. A short time later, the CD received a text message from telephone number 832-468-7974. The text message stated, "This M, Will hit me back." The CD stated he knew the telephone number belonged to **GONZALEZ** and that this message was from **GONZALEZ**. The CD further advised that he has transacted multiple cocaine purchases from **GONZALEZ** in the past, and that **GONZALEZ** was the CD's source of supply (or, at least one (1) of his sources of supply).

10. Based on the above and foregoing, your Affiant respectfully submits there is probable cause to believe that **Pearla ZUNIGA** and **Martin GONZALEZ** have committed a violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(ii), and 846, specifically, conspiracy to possess with the intent to distribute cocaine, a Schedule II Controlled Substance.



Affiant
Lawrence Lilly, Special Agent
Drug Enforcement Administration

SWORN TO and SUBSCRIBED before me this 8th day of June, 2018, and I find probable cause.



HON. CHRISTINA A. BRYAN
UNITED STATES MAGISTRATE JUDGE